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December 28, 2005

RETURN RECEIPT REQUESTED, PLEASE, BY E-MAIL

The Honorable Stephen L. Johnson, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

ATTN: Chemical Right-To-Know Program – Naphthenic Acid, Cobalt Salt

Dear Administrator Johnson:

OM Group, Inc., The Shepherd Chemical Company and Troy Corporation are pleased to present this test plan as part of the Metal Carboxylates Coalition commitment to the HPV program as specified in the letter from Lynne Jones on May 24, 2004. The chemical included in this test plan is:

61789-51-3 Naphthenic acid, cobalt salt

The sponsoring companies are OM Group, Inc., The Shepherd Chemical Company and Troy Corporation.

Attached is a copy of the test plan and supporting robust summaries. Electronic copies are also being submitted to oppt.ncic@epa.gov and chem.rtk@epa.gov.

The technical contact for this test plan is James F. Hobson, Ph.D. and he can be reached at (301) 916-4068, or by email at hobsonjfxxxxxx@msn.com. Administrative questions can be directed to me at (202) 721-4157.

Sincerely,

Lynne Jones Batshon
Metal Carboxylates Coalition
Executive Director

cc: S. Grove, OM Group, Inc.
J. F. Hobson, MorningStar Consulting, Inc.
C.T. Helmes, SOCMA